

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

LARRY DEHAVEN and JEANNETTE DEHAVEN

Plaintiff/Petitioner

v.

3M Company, et al.,

Defendant/Respondent

No. 2018 L 008777

FILED  
6/11/2019 4:29 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2018008777

5379002

SUBPOENA IN A CIVIL MATTER  
(For Testimony and/or Documents)

To: Regional Freedom of Information Officer

U.S. EPA, Region 5

77 West Jackson Blvd. Chicago, IL 60604-3590

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable \_\_\_\_\_  
in Room \_\_\_\_\_, Illinois on \_\_\_\_\_,  
at \_\_\_\_\_ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at:  
in Room \_\_\_\_\_, Illinois on \_\_\_\_\_,  
at \_\_\_\_\_ m.
- ☐ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to Vogelzang Law  
at 401 N. Michigan Ave., Suite 350 Chicago, Illinois 60611, on or before July 9, 2019,  
at \_\_\_\_\_ m.

(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☒ Description continued on attached page(s).

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- ☐ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: \_\_\_\_\_

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by \_\_\_\_\_  
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. 60075

Pro Se 99500

Name: Wyatt Berkover

Issued by: \_\_\_\_\_

Signature

Atty. for: Plaintiff

☒ Attorney

Address: 401 N. Michigan Ave., Suite 350

☐ Clerk of Court

City/State/Zip: Chicago, Illinois 60611

Telephone: 312-466-1669

Date: June 11, 2019

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to \_\_\_\_\_  
by certified mail, return receipt requested (Receipt # \_\_\_\_\_) on \_\_\_\_\_.
- I paid the witness \$ \_\_\_\_\_ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to \_\_\_\_\_ on \_\_\_\_\_.
- I paid the witness \$ \_\_\_\_\_ for witness and mileage fees.

(Signature of Server)

(Print Name)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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Atty. No. 60075

Pro Se 99500

Name: Wyatt Berkover

Issued by: \_\_\_\_\_

Signature

Atty. for: Plaintiff

☒ Attorney

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Facility Names:

1. B.C. Cobb Power Plant
2. Marathon Oil Corporation
3. Hooker Chemical
4. John Deere Company
5. Caterpillar, Inc.
6. Quad Cities Nuclear Generating Station
7. Inland Steel
8. AM General, LLC.
9. S.D. Warren Co./Scott Paper Co.
10. Filter City Paper Mill
11. Dow Chemical Company
12. Palisades Nuclear Generating Station
13. Ludington Pumped Storage Power Plant
14. GTE Building (k/n/a Verizon)
15. First Energy Generation Station
16. Sun-Chemical

5379002

Locations:

1. Muskegon, Michigan 49442
2. 698 Holton Rd. North Muskegon, MI 49445
3. Whitbeck Rd. Montague, MI 49437
4. 1 John Deere Pl. Moline, IL 61265
5. 8826 US-24 Mapleton, IL 61547
6. 22710 206th Ave. Cordova, IL 61242
7. 3210 Watling St. East Chicago, IN 46312
8. 105 N Niles Ave. South Bend, IN 46617
9. 2400 Lake Shore Dr. Muskegon, MI 49441
10. 2416 Grant St. Manistee, MI 49660
11. 2040 Dow Ctr. Midland, MI 48674
12. 27780 Blue Star Hwy. Covert, MI 49043
13. 3525 S Lakeshore Dr. Ludington, MI 49431
14. 2441 Olthoff Dr. Muskegon MI 49444
15. 76 S Main St. Akron, OH 44308
16. 5025 Evanson Ave. Muskegon, MI 49442

Request:

Earliest Time Period Available through 2019

Please provide any and all documents pertaining to the above listed facilities located at the above addresses relating to any asbestos used in products produced by the facility (facility process) or relating to any asbestos within pertaining to abatement or demolition. Please also provide the qualified landfills to handle asbestos waste for each facility listed above.

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Please include any and all information contained within the facility/plant file, permits (both active and voided), complaints, investigations, inspection reports, correspondence or documentation with the EPA.

Production:

Please produce the requested documents in electronic format. Additionally, if the expense to produce these documents is estimated to exceed \$500.00, please contact me via the information provided in the attached Subpoena request document.

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